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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of)
)
Service Rules for the 746-764 and)
776-794 MHz Bands, and)
Revisions to Part 27 of the)
Commission's Rules)

WT Docket No. 99-168

To: Chief, Wireless Telecommunications Bureau

COMMENTS

The National Translator Association ("NTA"), by its attorney, hereby submits its comments in the above-captioned proceeding. NTA is a nonprofit volunteer organization dedicated to the preservation of free over-the-air television for all areas of the United States. Membership is made up of organizations and individuals licensed to operate TV and FM translator stations, persons who install and maintain translators, and full service broadcasters who benefit from the extended service provided by translators.

Many TV translators operate on a channel in the range of 60-69, the now lost portion of the TV band. Many of those translators are going to experience difficulty in relocating to a lower channel, and a few will probably not be able to do so at all. For this reason, NTA members are vitally interested in the future uses of this part of the spectrum.

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NTA urges the Commission to recognize that members of the public who live in remote areas should have a full complement of over-the-air signals available to them. This has not been achieved, partly because a lack of filing windows in the last several years has resulted in delays in getting FCC approval for additional translators. NTA submits that the objective should be to get 10 to 12 analog channels available in translator-dependent areas.¹ In addition, there will soon be a need for additional translator to extend the signals of DTV stations to areas currently served by translators.

The situation may become somewhat less difficult when all TV transmissions are digital and the channels can presumably be packed in tighter, but during the time until the transition to digital is complete, maximizing access to channels 60-69 is of critical importance to NTA members.

Continued Operation on Channels 60 to 69

Previous Reports and Orders have made it clear that TV translators will be allowed to continue using channels 60 to 69 until, on a case by case basis, interference to a new user makes a change necessary. NTA requests that the Commission make it completely clear that a successful bidder may not force a translator in his area to shut down until the new facilities authorized to him are put into operation and actual interference occurs.

Further, NTA requests that a successful bidder be prohibited from demanding compensation for a

¹Translator systems tend to carry the three older commercial networks, ABC, CBS, as well as NBC and PBS. Since the last filing window for new translators in 1994, however, the FOX, UPN, and Warner networks have emerged. The Paxson network and two Hispanic networks are also now significant and in demand in some areas, and there is a substantial audience for religious programming. Thus, the objective should be to have a minimum of eight channels and preferable to have twelve.

translators, use of the spectrum during the time until the new use is activated in the translator area.

It seems likely that successful bidders will be granted the use of a certain bandwidth of spectrum in a sizable geographic area, say a small state or half of a large state. In the event that a successful bidder feels that he will not need the spectrum in remote areas within his overall service area, he should be permitted, as a normal commercial transaction, to rent the spectrum to a translator licensee if the translator licensee wants to contract for long-term protection.

In order to achieve the most orderly transition, NTA strongly recommends that the spectrum segments be retained at the MHz bandwidth now in place, and that any parceling out of lesser bandwidths be done by the successful bidder(s).

Power Limits and Interference

The permitted power levels and spurious output levels have proven very workable in practice. Further, in the rare instances in which a TV translator causes interference to another service, the translator licensee is required to take corrective action. It should also be noted that TV translators universally transmit with horizontal polarization, while most if not all of the new uses will be in services that generally use vertical polarization, which provides significant isolation. Special blanket requirements for all translators in the 60 to 69 channel block remain unchanged and are consistent with the TV translator rules for other channels.

Summary

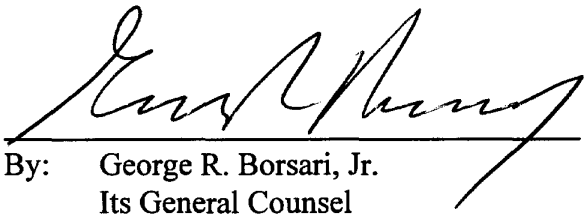
NTA believes that the Congress and the FCC in last several years have failed to recognize the value of TV translators to the public and that many actions taken as part of the transition to DTV have

adversely affected translators more than necessary.

NTA urge the Commission to keep the channel 60 to 69 spectrum available for TV translators to the maximum extent possible, consistent with congressional mandates, until such time as the transition to digital transmission has been completed.

Respectfully submitted,

NATIONAL TRANSLATOR ASSOCIATION


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